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Attorneys for Rabo AgriFinance LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

<p>IN RE:</p> <p>McCLAIN FEED YARD, INC., McCLAIN FARMS, INC. and 7M CATTLE FEEDERS, INC.,</p> <p>Debtors.¹</p>	<p>CASE NO. 23-20084-7-rlj</p> <p>(Jointly Administered Cases)</p> <p>Chapter 7</p>
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¹ The Debtors in these jointly administered Chapter 7 cases are: (a) McClain Feed Yard, Inc. (Case No. 23-20084), (b) McClain Farms, Inc. (Case No. 23-20885) and 7M Cattle Feeders, Inc. (Case No. 23-20886). All three cases are being jointly administered under the case number for McClain Feed Yard, Inc.



**SUPPLEMENT TO RABO AGRIFINANCE LLC’S AND FOCUS MANAGEMENT
GROUP USA, INC.’S OBJECTION AND OPPOSITION TO THE TRUSTEE’S MOTION
TO COMPEL PRODUCTION OF DOCUMENTS FROM RABO AGRIFINANCE AND
FOCUS MANAGEMENT**

Rabo AgriFinance LLC (“**Rabo**”), through counsel, hereby informs the Court that, on September 3, 2024, Rabo produced to the Trustee and to other parties-in-interest in both this case and in the various adversary proceedings related to this case documents bearing bates numbers RABO-MCCLAIN 0000007 – RABO-MCCLAIN 034518.

Thus, and notwithstanding the numerous objections to the Trustee’s Rule 2004 subpoena and his motion to compel [Dkt. 268] as outlined in Rabo’s response to the Trustee’s motion to compel [Dkt. 284], and without waiving its objections to the Trustee’s discovery requests and motion to compel as outlined therein, Rabo has now voluntarily produced over 34,500 pages of documents to the Trustee.²

² Rabo previously produced to the Trustee documents bearing bates numbers RABO-MCCLAIN 0000001 – RABO-MCCLAIN 0000006. This document is a copy of Rabo’s engagement letter with one of its expert witnesses, Dawson Forensic Group.

DATED this 3rd day of September, 2024.

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/s/ Michael R. Johnson

Michael R. Johnson

Attorneys for Rabo AgriFinance LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2024, the foregoing SUPPLEMENT TO RABO AGRIFINANCE LLC’S AND FOCUS MANAGEMENT GROUP USA, INC.’S OBJECTION AND OPPOSITION TO THE TRUSTEE’S MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM RABO AGRIFINANCE AND FOCUS MANAGEMENT was filed with the Clerk of the Court in the above-entitled case, which sent notice of electronic filing to all electronic filing users in the case.

/s/ Michael R. Johnson

Michael R. Johnson

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